

FILED  
Clerk  
District Court

001 10 2006

Jay H. Sorensen  
c/o Shanghai  
P.O. Box 9022  
Warren, MI 48090-9022  
Telephone: 86-21-5083-8542  
Fax: 86-21-5083-8542

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Attorney Appearing in Pro Se

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

ROBERT D. BRADSHAW,	)	
	)	
Plaintiff,	)	Case No. CV 05-0027
v.	)	
	)	<b>ANSWER TO THIRD</b>
COMMONWEALTH OF THE	)	<b>AMENDED COMPLAINT;</b>
NORTHERN MARIANA ISLANDS, et al.,	)	<b>DEMAND FOR JURY</b>
	)	
Defendants.	)	

Defendant, JAY H. SORENSEN, appearing for himself, responds to and answers the third amended complaint as follows:

1. The allegations of the following paragraphs are admitted: 1, 7, 15, 16, 18, 19, 20, 89, 91-94, 129, 144.

2. The allegations of the following paragraphs are denied: 21-39, 47-53, 63, 65, 74-76, 113, 114, 116, 130, 142, 143, 212-228, 326, 329-333, 335-336, 357, 359, 361, 362, 376, 377, 380-382.

3, This defendant has insufficient information as to the allegations of certain paragraphs, and based on the lack of sufficient information, denies them. Those paragraphs are: 3, 8-14, 17, 44, 56-58, 60, 61, 64, 66-73, 77-88, 99, 100, 115, 128, 131-137, 152-174, 175-196, 197-210, 233-260, 265-271, 276-279, and 340-344.

1           4. Certain of the paragraphs do not aver facts, but are legal contentions, rhetorical  
2 statements, musings, speculative conclusions or prayers for relief. To the extent that they  
3 may be considered allegations of fact, they are denied. Those paragraphs are: 2, 4, 5, 6,  
4 40-46, 54, 55, 59, 62, 95-98, 101-112, 117-127, 139-141, 145-151, 229-231, 261-263,  
5 272-274, 280-282, 320-325, 327, 334, 337, 338, 345, 346, 358, 360, 378.

6           5. In response to paragraph 90, defendant admits those allegations, except that the  
7 justification for entry of default was the Superior Court's determination that Bradshaw  
8 had been properly served by certified mail, had appeared in the case, and had waived any  
9 challenge to insufficient service of process, as articulated in the Order Denying Motion to  
10 Remove Case From Trial Docket filed February 22, 2000, and that Bradshaw had failed  
11 to file an answer.

12           6. Certain paragraphs merely incorporate preceding paragraphs by reference.  
13 Response to the incorporated paragraphs are as noted above. Those incorporating  
14 paragraphs are: 211, 232, 264, 275, 318, 328, 339, 356, 375, 379.

15  
16                                   AFFIRMATIVE DEFENSES


17           6. The second amended complaint fails to state a claim against this answering  
18 defendant.

19           7. The claims brought are barred by the applicable statute of limitations and/or  
20 the doctrine of laches.

21           8. Plaintiff has waived any rights he may have had that provide the basis for this  
22 action and is thereby estopped from any relief.


23           9. To whatever extent anyone may have misrepresented the receipt by plaintiff of  
24 service of process, such misrepresentation was not the cause of the default judgment  
25 entered against him, and hence, did not result in any harm to plaintiff.

1 WHEREFORE, defendant prays that plaintiff take nothing by his third amended  
2 complaint, that defendant be awarded judgment against plaintiff, and that defendant  
3 recover costs of suit herein incurred, as well as such other relief as the court may deem  
4 proper.  
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7  
8   
9 Jay H. Sorensen  
10 In Pro Se

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14 DEMAND FOR JURY

15 Pursuant to Rule 38, Federal Rules of Civil Procedure, this answering defendant  
16 hereby requests that all issues brought against him be submitted for jury determination.  
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21 Jay H. Sorensen  
22 In Pro Se  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on SEPT. 27, 2006


a copy of each of the following: ANSWER TO THIRD AMENDED COMPLAINT;  
DEMAND FOR JURY

were deposited for delivery to the U.S. Post Office, first class mail, postage prepaid,  
addressed as set forth below (except as noted below):

Robert D. Bradshaw  
P.O. Box 473  
1530 W. Trout Creek Road  
Calder, Idaho 83808

\* Office of the Attorney General – Civil Division  
Commonwealth of the Northern Mariana Islands  
2<sup>nd</sup> Floor, Hon. Juan A. Sablan Bldg  
Caller Box 10007  
Saipan, MP 96950

\* Mark B. Hanson  
First Floor, Macaranas Bldg.  
Beach Road, Garapan  
PMB 738, P.O. Box 10,000  
Saipan, MP 96950

  
Jay H. Sorensen

\* Served electronically by agreement of the parties